

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
*Northern Division***

PROTECT-A-CAR WASH  
SYSTEMS, INC.,

Plaintiff,

V.

CAR WASH PARTNERS, INC.,  
MCW INC., and JOHN L. LAI,

Defendants.

Case No.: 1:16-cv-00534-JFM

## DEFENDANT CAR WASH PARTNERS, INC.'S MOTION FOR SUMMARY JUDGMENT

Defendants Car Wash Partners, Inc. (“CWP”) and John Lai (collectively, “Defendants”) move pursuant to Rule 56 of the Federal Rules of Civil Procedure for an Order dismissing all of Plaintiff’s trademark infringement, related statutory and common law unfair competition, and Anticybersquatting Consumer Protection Act claims. In the alternative, to the extent the Court does not grant a complete dismissal of Plaintiff’s claims, Defendants move for summary adjudication of no damages.

The grounds for this Motion are set forth more fully in the accompanying Memorandum of Points and Authorities in Support of Defendants' Motion for Summary Judgment.

Dated: February 10, 2017

/s/ Hugh J. Marbury

Hugh J. Marbury

DLA Piper LLP (US)  
6225 Smith Avenue  
Baltimore, Maryland 21209  
Tel.: 410-580-4205  
Fax: 410-580-3205  
hugh.marbury@dlapiper.com

*Attorneys for Defendant Car Wash  
Partners, Inc. and Defendant John L. Lai*

Of Counsel:

Tamar Y. Duvdevani (*pro hac vice*)  
Gina Durham (*pro hac vice*)  
Kerry O'Neill (*pro hac vice*)  
DLA PIPER LLP (US)  
1251 Avenue of the Americas  
New York, NY 10020-1104